The Chemours Company FC, LLC
910-678-1213
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Fayetteville, NC 28306-7332

VIA EMAIL

January 3, 2018

Mr. Trent Allen
NC DEQ Division of Water Resources
225 Green Street
Suite 714
Fayetteville, NC 28301

RE: Notice of Potential Leak of HFPO Dimer Acid
NPDES Permit No. NC0003573
Chemours Company-Fayetteville Works
Bladen County

Dear Trent Allen:

The Chemours Company FC, LLC ("Chemours") hereby notifies the Department of Environmental Quality ("DEQ") of a small spill that potentially involved a de minimis amount of HFPO Dimer Acid at the Fayetteville Works on December 31, 2017. As explained further below, Chemours is making this report (i) even though the incident did not result in the exceedance of any applicable reportable quantity, (ii) even though reporting is not required by any applicable permit or regulation, but (iii) in the interests of cooperation and transparency given DEQ's ongoing focus on the handling of HFPO Dimer Acid at the Fayetteville Works. In that regard, Chemours conservatively estimates that the total mass of HFPO Dimer Acid potentially involved was less than 0.000113 pounds to the concrete and less than 0.0000226 pounds to the rocks/soil at the incident location.

Please find below a summary of the incident, the remedial steps undertaken, and an explanation of the estimated quantities involved. Please note that Chemours continues to investigate this incident and will supplement or revise this notice as necessary. Chemours also recommends that DEQ and Chemours discuss further reasonable parameters around reporting leaks of HFPO Dimer Acid and its chemical precursors

given the absence of any applicable regulatory or permit guidance on reporting such leaks.

Summary of Leak

On 12/31/2017, as a contractor was preparing to connect a hose to a waste water truck for transportation offsite for disposal, residual wastewater inside the hose came out of the end of the hose onto the concrete north of the Tank Farm dike. There was a spill of approximately 5 gallons of process wastewater (pH 10.6) onto a concrete surface, < 0.125 gallons (< 1 lb) of which ran off the edge of the concrete and into the adjacent rocks/soil.

Summary of Remedial Steps Undertaken

Within a minute of the spill, the Incident Commander placed absorbent pads on the concrete to absorb the residual wastewater. The area was then swept and pads used again to remove as much residual material off the concrete as possible. The soil and rocks were removed down to dry soil level and all of the removed soil/rock material was placed in a drum for subsequent disposal.

Contact was made with the contractor so that steps are taken in the future to ensure that the hose is free of liquid before exiting the diked area to make the connection to the truck for loading.

Estimate of Amount of HFPO Dimer Acid in the Leak

Based on visual observation, facility personnel estimated the total volume of spilled material onto the concrete at no more than 5 gallons (41.7 pounds) and the volume that ran off the concrete and into the adjacent soil/rocks to be less than 1 gallon (8.34 pounds). Because the hose could have contained wastewater from any (or even all) of the processes, the highest value ever measured back in July 2017 in the Nafion® Composite Sampler was used to calculate an estimate of the potential amount of HFPO Dimer Acid involved. Based on that methodology, the estimate of the mass of HFPO Dimer Acid that may have spilled to the concrete would have been approximately 0.000113 pounds and 0.0000226 pound to the adjacent soil/rocks.

As noted, Chemours took prompt action to capture and contain the spilled material.

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Chemours continues to investigate this incident and will supplement or revise this notice as necessary. In addition, Chemours continue to provide DEQ the results of Chemours' recurring Outfall 002 sampling. Please note that, it may be difficult if not impossible to estimate the extent (if any) that this spill may influence the forthcoming

Outfall 002 sample results in the event of an interim rain event, as opposed to the fluctuations in Outfall 002 sample results that Chemours has observed (and shared with DEQ) in connection with prior rain events.

If you have any questions or request additional information, please contact me at christel.e.compton@chemours.com or (910) 678-1213.

Sincerely,

Christel Compton
Program Manager

CC (via email):

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